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SOUTHWEST GAS CORPORATION

Justin Brown, Assistant General Counsel/Legal Affairs

May 14, 2010

Chairman Kristin K. Mayes Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007 Arizona Corporation Commission

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RE:

Rate and Regulatory Incentive Docket – Decoupling Workshop May 3, 2010 Docket Nos. G-00000C-08-0314 and E-00000J-08-0314

Dear Chairman Mayes:

Per your request during the May 3 decoupling workshop, attached is the communication plan that was submitted by Southwest Gas in response to the Public Utilities Commission of Nevada's order approving Southwest Gas' general rate case Docket 09-04003. The Public Utilities Commission of Nevada's finding was as follows:

182. The Commission finds that Southwest should file a description as to how it has and how it will continue to educate customers about decoupling and energy conservation as a compliance filing within 60 days of the issuance of this Order, and again in its initial annual conservation and energy efficiency plan report. . . . Southwest's discussion should include but not be limited to a description of each media campaign and the information provided in that campaign and a timeline for communicating the decoupling and energy conservation and energy efficiency messages through the initial months of decoupling.

Southwest Gas will concurrently file a copy of this letter and its attachment in the above-referenced docket. Thank you for your attention to this matter.

Sincerely,

Justin Lee Brown

Assistant General Counsel

cc:

Commissioner Gary Pierce Commissioner Paul Newman Commissioner Sandra D. Kennedy Commissioner Bob Stump Docket Control Z CORP COMMISSION

Southwest Gas Corporation's Communication Plan on Conservation and Energy Efficiency Programs and General Revenues Adjustment (Decoupling) Mechanism

Purpose:

The purpose of this communication plan is to increase customer understanding of the General Revenues Adjustment (GRA) mechanism, as well as the benefits of energy conservation and energy efficiency.

Goals:

The goal of the plan is to provide consistent key messages that describe in easy-to-understand language what the GRA mechanism is and how it enables Southwest Gas to help its customers lower their bills through increased conservation methods. Additional goals include promoting the company's energy-efficiency programs, and increasing employee awareness about the GRA and the conservation and energy-efficiency programs so that employees can work more effectively with customers.

Objectives:

- Distribute key messages about conservation and energy efficiency.
- Design and maintain the customer website in order to offer more information regarding the GRA, conservation, energy-efficiency programs and rebates.
- Create a variety of communications that clarify the concept of the GRA mechanism and the important customer benefits that conservation and energy efficiency provide.
- Utilize various methods of communication.
- Promote energy efficiency and the rebate programs to encourage increased customer participation.

Primary Audience:

Information will be targeted to all Southwest Gas customers based on geographical location and program availability.

Suggested Topics for Key Messages:

- Emphasize conservation and the efficient use of energy
- Describe the Company's portfolio of approved conservation and energy-efficiency programs and available rebates.
- Describe the GRA mechanism in easy-to-understand language. For example,
 What is the General Revenues Adjustment mechanism?
 - The General Revenues Adjustment mechanism provides Southwest Gas the opportunity to recover its fixed costs of providing service while actively promoting the efficient use of energy.

Tools/Tactics:

Update the Southwest Gas website with links and other relevant information.

Place print ads, news releases, and 30-second radio spots in local newspapers and radio stations respectively.

Develop advertorials for trade publications.

Create brochures, flyers, and retractable banners for use at outreach activities, and direct mail opportunities.

Develop talking points for Customer Assistance and media relation's employees.

Educate employees through articles in internal publications.

Develop on-hold messages.

Timelines for External Communications:

4th Quarter 2009 - Completed

News to Use bill insert – Generic Conservation Tips News Releases – Conservation/Energy Efficiency Web site updated – Conservation/Energy Efficiency Programs

1st Quarter 2010

News to Use bill insert – Generic Conservation Tips Radio and print advertising for Conservation/Energy Efficiency Education

4th Quarter 2010

Bill insert – GRA message/Conservation/Energy Efficiency
News to Use – Conservation Tips
Radio and print advertising for Conservation/Energy Efficiency Education
News releases

1st Quarter 2011

News to Use bill insert – Conservation/Energy Efficiency Bill inserts – GRA message/Conservation/Energy Efficiency Radio and print advertising for Conservation/Energy Efficiency Education

2nd Ouarter 2011

Bill inserts – GRA message/Energy Conservation and Energy Efficiency Radio and print advertising for Conservation/Energy Efficiency

4th Ouarter 2011

News to Use – Conservation/Energy Efficiency
Radio and print advertising for Conservation/Energy Efficiency Education
News releases

Timelines for Internal Communications:

4th Quarter 2009

GRA and energy-efficiency articles in employee publications to be distributed in January.

1st through 4th Quarter 2010

GRA and energy-efficiency articles in employee publications.

1st through 4th Quarter 2010 per NCEE Plan

Website, including informational links to other relevant and helpful resources

Advertorials

Outreach activities

On-hold messages

Retractable banners

Brochures

Flyers

Talking points for Customer Assistance employees and media relation's employees

Areas of responsibility:

State Regulatory Affairs

Corporate Communications

Pricing

Measurement and Evaluation

Customer feedback on rebates, energy efficiency and conservation Audience actions/behaviors regarding lower gas bills and rebate participation